

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ZAOSONG ZHENG

Defendant

CRIMINAL No. 20-cr-10015-DJC

STATUS REPORT AND
ASSENTED-TO MOTION FOR THIRTY-DAY CONTINUANCE

The United States of America, by Andrew E. Lelling, United States Attorney, and Benjamin Tolkoff, Assistant United States Attorney for the District of Massachusetts, and counsel for defendant Zaosong Zheng, respectfully submit this status report pursuant to Local rule 116.5(a).

1. The government made its automatic discovery production pursuant to Local Rule 116.1 on February 28, 2020. Counsel's review of materials that the government has produced to date is ongoing. At present, there are no pending discovery requests. Counsel reserve the right to request additional discovery at a later date to be set by the Court after counsel's review of materials produced to date has progressed further. The government understands that it has an ongoing and continuing duty to produce discovery.

2. At present, the government anticipates further discovery in the form of data seized from the defendant's electronic devices, as that data is processed and translated.

3. Counsel reserves their right to request additional discovery at a later date to be set by the Court after counsel's review of materials produced to date has progressed further.

4. The parties submitted a stipulated proposed discovery protective order for the Court's review on February 28, 2020.

5. The parties believe that it is too early to establish a motions date and request that a motions date be set at a future status conference.

6. The government request that the government's expert disclosures, if any, be due 21 days before trial, and that the defendants' expert disclosures, if any, be due 14 days before trial.

7. The parties respectfully request that the current status appearance scheduled for March 13, 2020, be continued for approximately thirty days, subject to the the Court's availability.

8. The parties agree that the period between March 13, 2020, until the date on which the court sets an interim status conference, should be excluded under the Speedy Trial Act.

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

By: /s/ Ben Tolkoff
BENJAMIN TOLKOFF
Assistant U.S. Attorney

Dated: March 12, 2020.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

*/s/ Ben Tolhoff*_____
BENJAMIN TOLKOFF
Assistant United States Attorney

Date: March 12, 2020